Introduction

Department of Environmental Services Forum

On

UST & Vapor Recovery Rule Changes

May 24, 2005

Today's Agenda

- Welcome!!
- Reason for Seminar
- Items to be covered by:
  - VR – Harding Schofield
  - UST – Christie Peshka
  - Break
  - UST – Rob Stockman
  - FAQ – Thomas Beaulieu
  - Q&A Session

Evolution

- 1985 - Ws 411 – “Control of Non Residential Underground Storage and Handling of Oil and Petroleum Liquids”
- 1988 - Fed. Rules – 40 CFR 280
- 1990 – Ws 411 – “Control of Underground Storage Facilities”
- 1991 – Delegation of Fed. UST Program

Evolution Cont:

- 1997 – Env-Wm 1401 – “Underground Storage Facilities”
- 1998 – EPA deadline to close unprotected single-wall systems
- 2002 – Acquired Vapor Recovery Prog. From ARD

Evolution Cont:

- 2003 – Commenced Operational Compliance Inspections
- 2004 – Env-Wm 1404 – Vapor Recovery Rules
- 2005 – Env-Wm 1401 – Underground Storage Facilities

USGS/NHDES Rockingham County MtBE Study

- Groundwater provides 75% of drinking water
- MtBE in drinking water wells
  - Public – 40%
  - Private – 21%
- Contaminated UST sites
  - Approx. – 200, 3/4ths due predominately to vapors

Why Stay in Compliance?

- Required $1M Financial Responsibility Mechanism
- To Save Money!!!!
  - Reimbursement Fund Deductible
    - $5K to $30K
  - $15M Spent Annually from Funds
- To Avoid Enforcement

Enforcement Policy

- On-Site Inspection by DES
  - 30 days to fix deficiencies
  - 15 days to report to DES
- Admin. Fine/License Action (AFLA)
  - 90 days to comply
  - Fine must be paid
- Request USTs to be Closed

How to Contact Me

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UST Inspectors Forum
on
Underground Storage Tank &
Vapor Recovery
Rule Changes

May 24, 2005

Notable Vapor Recovery Rule Changes

- Stage I Monthly inspection
- Stage I Yearly Inspection
- Stage II Monthly Inspection
- Stage II Yearly Inspection
- Bulk Terminals
- Marinas / Airports

Notable Vapor Recovery Rule Changes

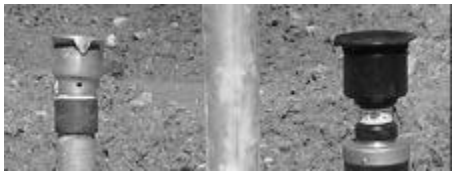

Stage I

Monthly

Maintenance Inspections of Vapor Recovery System

Harding Schofield

- Stage I **Monthly** inspection
  - Check vent risers for damage
  - Check PV vent cap



Notable Vapor Recovery Rule Changes

Harding Schofield

- Stage I **Monthly** inspection (Cont.)
  - Check Spill buckets for water, etc.
  - Check fill adaptor and dry break caps for tightness
  - Document


Stage I

Monthly

Maintenance Inspections of Vapor Recovery System

Notable Vapor Recovery Rule Changes

- Stage I **Yearly** Inspection
  - No later than Sept. 30th of each year and at least 10 months between each inspection:
    - Perform all items in Monthly Inspections
    - Remove adaptors from riser pipes, clean, apply sealant, and replace
    - Replace or plug spill bucket drain valves, etc.
    - Document


Stage I

Yearly

Maintenance Inspections of Vapor Recovery System

Notable Vapor Recovery Rule Changes

Stage II **Monthly** Inspection


Stage II
Monthly
Maintenance Inspections of Vapor Recovery System

- Include Stage I
- Balance systems
  - Check dispenser hoses for leaks, etc.
  - Check nozzle bellow for tears, leaks, holes

  Assist systems
  - Check hose for kinks or crimps
  - Check nozzle spout for looseness
  - Check vapor return holes for blockage
  - Document

Notable Vapor Recovery Rule Changes

Stage II **Yearly** Inspection

No later than Sept. 30th of each year and at least 10 months between each inspection:


Stage II
Yearly
Maintenance Inspections

- Perform all items in Monthly Inspections
- Remove adaptors from riser pipes, clean, apply sealant, an replace
- Replace or plug spill bucket drain valves, etc.
- Document

Notable Vapor Recovery Rule Changes

Stage I Vapor Recovery requirements will apply to bulk terminals and or bulk gasoline plants within 3 years of the adopted date of the rules (By August 07)

Stage I Vapor Recovery requirements will apply to facilities servicing motorized water vehicles and airplanes.

Notable Vapor Recovery Rule Changes

- Websites:
  - http://www.des.state.nh.us/Rulemaking/Adopted/Env Wm1404.pdf
  - http://www.des.state.nh.us/orcb/ustprog.htm
    - Monthly and yearly inspection forms

UST Notable Changes

Christie Peshka

- Permit to Operate
  - Facility must be in compliance with UST and Vapor Recovery rules

UST Notable Changes

- Inventory
  - Double wall, continuously monitored TANKS do not require inventory monitoring.
  - Heating oil PIPING that is not continuously monitored must be tightness tested every three years

UST Notable Changes

Regulated Substance Transfer

- Facility permit-to-operate
- Sufficient capacity
- Spill and overfill protection
- Stage I equipment

UST Notable Changes

- Spill Containment and Overfill Protection
  - 
    Spill bucket must be tested at installation
  - Ball floats are not allowed on suction systems with air eliminators

UST Notable Changes

- Spill Containment and Overfill Protection (Cont)
  - All new audible alarms shall be clearly labeled

  - High level alarms required on pressurized or non-tight drops

UST Notable Changes

- Testing Forms
  - Annual line leak detector tests
  - Annual leak monitor tests
  - Automatic tank gauge tests
  - Inventory
  - Cathodic protection

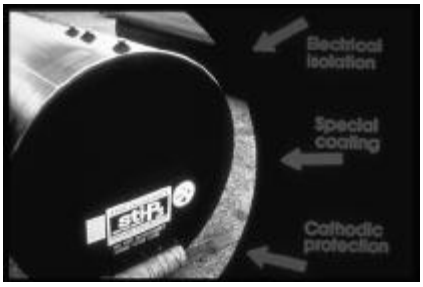
- Availability
  - Hand Outs
  - Web Site - http://www.des.state.nh.us/orcb/doclist
  - NHDES

UST Notable Changes

- Temporary Closure
  - All openings must be equipped with a lock
  - Within 30 days a new registration form must be submitted indicating temporary closure
  - Any portion of a system without secondary containment and leak monitoring, which has been in temporary closure for over 12 months must be permanently closed (not a new rule)

UST Notable Changes

- Corrosion Protection
  - Failed cathodic protection systems must be repaired within 90 days, or the system must be permanently closed



UST Notable Changes

Robert Stockman

- New Dispensing Sump Sensor
  - Sensors must be installed in a dispenser sump if dispenser sump is not continuously monitored.

UST Notable Changes

- Sumps

- All sumps must be free of debris

UST Notable Changes

- Installation of New UST Systems

- Test primary, secondary, vent, and stage II piping before and after backfilling

- Test all sumps Spill buckets and dispenser pans

UST Notable Changes

- Installation of New UST Systems

- Positive limiting barrier having a volume of at least 5 gal. per dispenser

- Dispensing nozzles not to extend beyond positive limiting barrier

UST Notable Changes

- New Installation Continued:
  - Water Supplies:
    - Public Water System Well
      - Gasoline systems – 500 ft.
      - All regulated substances except gasoline – 400 ft.
    - Non-Public Water Supply Well
      - Gasoline systems – 250 ft.
      - All regulated substance except gasoline – 75 ft.

UST Notable Changes

- New Installation Continued:
  - Bollards shall be installed around free standing vent lines
  - Swivel adaptors shall be installed on all new fill riser pipes

UST Notable Changes

- Marinas
  - New and replaced nozzles shall be automatically closing, without a device allowing the nozzle to remain open

UST Notable Changes

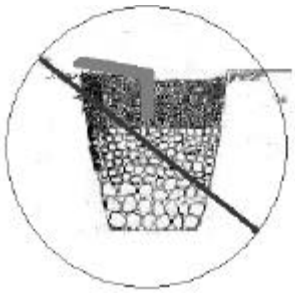
- New Installation Continued:

  Storm water from canopy shall not be directed to flow over any tank pad or dispensing pad

UST Notable Changes

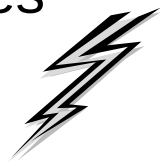
- New Installation Continued:

  Storm water runoff from tank and dispensing area shall not be discharged to the subsurface



UST Notable Changes

- Corrosion Protection



  - New or replaced vent piping and riser pipes for gasoline tank systems must be corrosion protected

Need Additional Information?

- Contact:
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Need Additional Information?

- Contact:
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Frequently Asked Questions

Tom Beaulieu

- Overfill Alarms
- Corrosion Protection
- Canopy Drains
- Storm Water Runoff
- Repairs

Overfill FAQ's

- Pressurized deliveries or
- Non-tight fill deliveries

high level visual and audible overfill alarm.

Overfill FAQ's (cont.)

- By Waiver Request Only:

  61SO F STOP1000

1. Pressurized Fill Only
2. Remove ball float;
3. Tag; and
4. Venting calculations.

Corrosion Protection FAQ's

- Cathodic Protection
- Isolation

  Gasoline Vent Systems
  - Bondable flexible non-metallic boot around flex connecto
  - Secured flexible piping

  Gasoline Risers
  - 1/8" of Fiberglass
  - 1/8" of Epoxy

  Gasoline Adaptors, Fittings, Extractors greater than schedule 40 steel

Canopy Drains FAQ's

Canopy Drains

Drained away from dispensing area or

Underground Drains

Runoff FAQ's

Storm Water Runoff

If runs across dispensing area

Cannot discharge to subsurface

Can discharge to open surface area

Can discharge to storm water catch basins

Tank Repair FAQ's

Tank Repairs

1. Liners not regulated
2. Report prior to work
    a. Locate failure
    b. Manufacturer certification
3. Report after repair
    a. Cause and Location of failure
    b. Interstitial space free of liquid and tight
    c. Manufacturers certifying to repair
    d. Company repairing tank